UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

| FOR THE MIDDLE I | ES DISTRICT COU DISTRICT OF TEN LLE DIVISION | Modell Glanville. |
|--------------------------|--|-------------------|
| UNITED STATES OF AMERICA |) | |
| |) | UNDER SEAL |
| |) | No. 3:16-000116-2 |
| v. |) | |
| |) | JUDGE TRAUGER |
| |) | |
| TERRELL PIERSON |) | |

MOTION TO APPOINT COUNSEL

The defendant, Terrell Pierson, by and through counsel, David R. Heroux, herein moves this Honorable Court to appoint said counsel to represent the defendant in the Middle District of Tennessee in the above captioned matter pursuant to United States Code Annotated Title 18, Section 3006A.

On May 26, 2016, the defendant was arrested on charges out of the Middle District of Tennessee. The arrest was at the defendant's home in Northern Chicago, and the arrest was without incident. On May 27, 2016, the defendant appeared for a detention hearing before Magistrate Judge, Young B. Kim in the United States District Court for the Northern District of Illinois, Eastern Division. The defendant was represented by appointed counsel, Attorney John M. Beal, pursuant to the Criminal Justice Act after the defendant was determined to be indigent.

At the conclusion of the detention hearing Magistrate Judge Kim ordered the release of the defendant subject to various release conditions. However, upon the motion of the United States, at the direction of Assistant United States Attorney for the Middle District of Tennessee, Clay T. Lee; the Magistrate stayed his release order pending the appeal of his ruling pursuant to Title 18, U.S.C. section 3145. The United States filed a sealed "Motion Appealing Release"